

Exhibit A

ENRICHETTA RAVINA
ENRICHETTA RAVINA v COLUMBIA UNIVERSITY

May 08, 2017

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<p style="text-align: right;">Page 1</p> <p>1 Ravina</p> <p>2 UNITED STATES DISTRICT COURT</p> <p>3 SOUTHERN DISTRICT OF NEW YORK</p> <p>4 -----x</p> <p>5 ENRICHETTA RAVINA,</p> <p>6</p> <p>7 Plaintiff,</p> <p>8</p> <p>9 v. Case No.: 1:16-cv-02137(RA)</p> <p>10</p> <p>11 COLUMBIA UNIVERSITY AKA</p> <p>12 THE TRUSTEES OF COLUMBIA</p> <p>13 UNIVERSITY IN THE CITY</p> <p>14 OF NEW YORK AND GEERT</p> <p>15 BEKAERT,</p> <p>16</p> <p>17 Defendants.</p> <p>18 -----x</p> <p>19</p> <p>20 ENRICHETTA RAVINA</p> <p>21 New York, New York</p> <p>22 Monday, May 8, 2017</p> <p>23</p> <p>24</p> <p>25</p> <p>26 Reported by: Steven Neil Cohen, RPR</p> <p>27 Job No. J0542811</p>	<p style="text-align: right;">Page 3</p> <p>1 Ravina</p> <p>2 APPEARANCES</p> <p>3</p> <p>4 SANFORD HEISLER LLP</p> <p>5 1350 Avenue of the Americas</p> <p>6 31st Floor</p> <p>7 New York, New York 10019</p> <p>8 Attorneys for Plaintiff</p> <p>9 BY: DAVID SANFORD, ESQ.</p> <p>10 ALEXANDRA HARWIN, ESQ.</p> <p>11</p> <p>12 PROSKAUER ROSE LLP</p> <p>13 Eleven Times Square</p> <p>14 New York, New York 10036-8299</p> <p>15 Attorneys for Defendant the</p> <p>16 Trustees of Columbia University</p> <p>17 in the City of New York</p> <p>18 BY: BETTINA B. PLEVAN, ESQ.</p> <p>19 RACHEL S. FISCHER, ESQ.</p> <p>20 YONATAN GROSSMAN-BODER, ESQ.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 2</p> <p>1 Ravina</p> <p>2 May 8, 2017</p> <p>3 9:43 a.m.</p> <p>4</p> <p>5 Videotaped Deposition of</p> <p>6 ENRICHETTA RAVINA, taken by Defendants,</p> <p>7 pursuant to notice, at the offices of</p> <p>8 Proskauer Rose LLP, Eleven Times Square, New</p> <p>9 York, New York, before Steven Neil Cohen, a</p> <p>10 Registered Professional Reporter and Notary</p> <p>11 Public of the State of New York.</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 Ravina</p> <p>2</p> <p>3 HERNSTADT ATLAS PLLC</p> <p>4 45 Main Street</p> <p>5 Suite 1030</p> <p>6 Brooklyn, New York 11201</p> <p>7 Attorneys for Defendant Geert</p> <p>8 Bekaert</p> <p>9 By: EDWARD HERNSTADT, ESQ.</p> <p>10</p> <p>11</p> <p>12 ALSO PRESENT:</p> <p>13 Patricia S. Catapano, Esq.</p> <p>14 Melody Wong</p> <p>15 Aydaline Garcia, Videographer</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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2 A. I believe it must have been a

3 company that was hired for that purpose.

4 Q. Did you turn over all your e-mails

5 to your counsel?

6 A. I don't think they have access to

7 my e-mails.

8 Q. So did you provide something to

9 this company you are referring to?

10 A. I give them -- I give the company

11 access through password.

12 Q. Did you give that company access

13 to all of your e-mail accounts?

14 A. Yes.

15 Q. Professor Ravina, are you married?

16 A. No.

17 Q. Have you ever been married?

18 A. No.

19 Q. Where were you born?

20 A. In Italy, Saviliano.

21 Q. Did you go to university

22 undergraduate in Italy?

23 A. Yes.

24 Q. What is your current citizenship?

25 A. Italian and United States.

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2 Q. When did you become a U.S.

3 citizen?

4 A. In the fall of 2013, I believe.

5 Q. What is your date of birth?

6 A. [REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

1 Ravina Page 89

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1 Ravina Page 91

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25

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[REDACTED]



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[REDACTED]

15 Q. Now, in addition to giving access
16 to your e-mails did you provide access to
17 either your counsel or someone acting on
18 your behalf to your text messages?
19 A. No. I was asked if there was
20 anything in my text messages that was
21 relevant.
22 Q. How did you respond?
23 A. To the best of my knowledge
24 nothing was relevant.
25 Q. Now, you also had tape recordings

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2 that you made of conversations?
3 A. Right.
4 Q. Correct?
5 A. Yes.
6 Q. When did you start making tape
7 recordings of conversations with people at
8 Columbia or regarding your experience at
9 Columbia?
10 A. Based on my recollection, sometime
11 in the winter of 2015.
12 Q. And what did you -- what device
13 did you use to make these tape recordings?
14 A. I don't know the exact name of the
15 device.
16 Q. Is it -- well, describe it as much
17 as you can.
18 A. It is a small device, probably as
19 big as this device, I would say, one inch
20 times maybe two, two-and-a-half, black.
21 Q. Where did you get the device?
22 A. I bought it on Amazon.
23 Q. Do you still have it?
24 A. No.
25 Q. What did you do with it?

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2 A. The battery died. I threw it
3 away.
4 Q. The battery died?
5 A. It wouldn't keep charge, I would
6 charge it and the battery would go back to
7 zero.
8 Q. What did you do with it at that
9 point?
10 A. I throw it away because it wasn't
11 holding the battery.
12 Q. When did you throw it away?
13 A. It was sometimes in spring of
14 2016.
15 Q. After this lawsuit was filed?
16 A. After this lawsuit was filed.
17 Q. Now, do you have a record of your
18 purchases from Amazon?
19 A. I do.
20 Q. So you could determine the nature
21 of the device?
22 A. Yes. I could get back to you.
23 MS. PLEVAN: We request whatever
24 record she has that shows what type of
25 device this was.

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2 BY MS. PLEVAN:
3 Q. And after recording was done just
4 generally what did you do with the material
5 that was on this device?
6 A. I transferred it on my computer.
7 Q. Did you -- so would you transfer
8 it to -- well, tell me what your practice
9 was.
10 A. Sometimes this device would start
11 recording even if I wasn't having any
12 conversation or I was on the subway so in
13 those cases I would delete the recordings
14 and otherwise I would save it to my
15 computer.
16 Q. Did there come a point -- you
17 said, I believe, that you started the tape
18 recordings in the winter of 2015. When did
19 you stop?
20 A. I don't recall exactly when I
21 stopped. However, there was a time in which
22 I stopped having conversations that were in
23 person with Columbia administrators and so I
24 stopped.
25 Q. I am sorry. Could you repeat what



<p style="text-align: right;">Page 269</p> <p>1 Ravina</p> <p>2 do in terms of asking Professor Bekaert to</p> <p>3 have a schedule and considering various</p> <p>4 solutions that I try to implement to solve</p> <p>5 my situation, to stop the harassment, to</p> <p>6 stop the retaliation were generated talking</p> <p>7 with him so I believe he was and he is</p> <p>8 extremely beneficial.</p> <p>9 We have been talking about this</p> <p>10 for more than three years right now and we</p> <p>11 think --</p> <p>12 Q. Do you talk to Dr. Silbert about</p> <p>13 anything else beside your problems with</p> <p>14 Professor Bekaert?</p> <p>15 A. The problem with Professor Bekaert</p> <p>16 and Columbia covers 95 percent or more.</p> <p>17 Q. What is the other 5 percent?</p> <p>18 A. Sometimes we would talk about my</p> <p>19 friends, sometimes we would talk about</p> <p>20 moving to Chicago and going to Kellogg, I</p> <p>21 believe is related to Bekaert so I shouldn't</p> <p>22 increase the percentage that I say before.</p> <p>23 We would talk about, like when I</p> <p>24 was sick and I had the hyperthyroidism and I</p> <p>25 was diagnosed. We talked about that. That</p>	<p style="text-align: right;">Page 271</p> <p>1 Ravina</p> <p>2 Q. Did you talk to Dr. Silbert at all</p> <p>3 about bringing a lawsuit?</p> <p>4 A. Yes.</p> <p>5 Q. And what did you talk to him about</p> <p>6 with respect to bringing a lawsuit?</p> <p>7 A. We discussed -- we discussed all</p> <p>8 the -- every week I would have an update on</p> <p>9 what was going on. I -- when I saw that</p> <p>10 bringing a lawsuit was the only thing that I</p> <p>11 would still have in front of me I was</p> <p>12 actually quite, quite nervous. I tried to</p> <p>13 see if there was any other possibility. We</p> <p>14 thought we covered all the other</p> <p>15 possibilities. So I talked to him about the</p> <p>16 stress of making such a situation public.</p> <p>17 I talked about the repercussion</p> <p>18 that it would have for my career.</p> <p>19 I talked about the stress and</p> <p>20 the --</p> <p>21 Q. Have you suffered stress from the</p> <p>22 lawsuit itself?</p> <p>23 A. Yes.</p> <p>24 Q. Did Dr. Silbert express any</p> <p>25 professional opinion regarding the bringing</p>
<p style="text-align: right;">Page 270</p> <p>1 Ravina</p> <p>2 would be most of it.</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 We talked once relatively recently</p> <p>6 about my parents passing away.</p> <p>7 Q. When did that happen?</p> <p>8 A. My father passed away in 2010 in</p> <p>9 June and my mother passed away in February</p> <p>10 of 2013.</p> <p>11 Q. You mentioned earlier that</p> <p>12 Dr. Silbert at one point suggested some</p> <p>13 medication for your insomnia. Have you been</p> <p>14 taking any medication that Dr. Silbert has</p> <p>15 prescribed for you?</p> <p>16 A. I didn't want him to make a</p> <p>17 prescription. He recommended it and I said</p> <p>18 I prefer not to so he recommended instead</p> <p>19 that I go to meditation, that I walk around</p> <p>20 the reservoir everyday in the morning and</p> <p>21 other lifestyle changes.</p> <p>22 Q. Have you been doing that?</p> <p>23 A. Not every morning. It brings me</p> <p>24 solace but if I am tired and I have a busy</p> <p>25 day sometimes I skip it.</p>	<p style="text-align: right;">Page 272</p> <p>1 Ravina</p> <p>2 of a lawsuit?</p> <p>3 A. Do you mean whether I should or</p> <p>4 not?</p> <p>5 Q. Yes.</p> <p>6 A. No. He -- he doesn't make</p> <p>7 recommendations.</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 Q. What made you decide to seek</p> <p>13 publicity about this lawsuit?</p> <p>14 A. I felt that at the time -- at the</p> <p>15 point that I arrived when there were already</p> <p>16 so many people knowing about this, seeking</p> <p>17 publicity was on one side inevitable, I</p> <p>18 felt, and having publicity was inevitable</p> <p>19 and publicity in some respects protects me</p> <p>20 because when my story is out there, my</p> <p>21 version is there together with all the other</p> <p>22 gossips so like other way people might spin</p> <p>23 this story. It protects me because a lot of</p> <p>24 things in academia and probably all other</p> <p>25 jobs happen behind the scene and I -- if</p>



<p style="text-align: right;">Page 440</p> <p>1 Ravina</p> <p>2 A. Sometimes.</p> <p>3 Q. Do you go to dinner with</p> <p>4 co-authors?</p> <p>5 A. Sometimes.</p> <p>6 Q. Is it fairly normal to go to</p> <p>7 dinner with co-authors?</p> <p>8 A. Yes. But the conversation stays</p> <p>9 professional.</p> <p>10 Q. Do you recall inviting Professor</p> <p>11 Bekaert to join your gym?</p> <p>12 A. No. I did not invite him to join</p> <p>13 my gym. He made a joke -- he made a</p> <p>14 non-serious bet about something and I told</p> <p>15 him that he should go to my gym if he loses</p> <p>16 just because it is a gym only for women.</p> <p>17 Q. Was this a professional</p> <p>18 conversation or a casual conversation</p> <p>19 between two people?</p> <p>20 A. It was part of the many</p> <p>21 conversations in which Professor Bekaert put</p> <p>22 pressure on me on being friendly and talking</p> <p>23 about nonwork matters and that I felt I had</p> <p>24 to oblige.</p> <p>25 Q. Are you saying that Professor</p>	<p style="text-align: right;">Page 442</p> <p>1 Ravina</p> <p>2 Q. Did you remember telling him that</p> <p>3 you weren't interested in a particular man</p> <p>4 because he wasn't good enough looking?</p> <p>5 A. No. Who is that?</p> <p>6 Q. Do you remember talking to him</p> <p>7 about other personal interests?</p> <p>8 A. Romantic interests?</p> <p>9 Q. Romantic or friend. Things that</p> <p>10 were per -- things in your personal life.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>19 Q. You have alleged that Professor</p> <p>20 Bekaert delayed work on the Financial</p> <p>21 Engines papers; is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. When was the first time that he</p> <p>24 delayed work on the Financial Engines</p> <p>25 papers?</p>
<p style="text-align: right;">Page 441</p> <p>1 Ravina</p> <p>2 Bekaert put pressure on you by being</p> <p>3 friendly?</p> <p>4 A. He wanted me to be friendly with</p> <p>5 him. He asked about my personal life. He</p> <p>6 talked about his personal life.</p> <p>7 He made sexual innuendos. He</p> <p>8 created a situation in which in order to</p> <p>9 keep in his good graces I felt that every</p> <p>10 once in a while I should say something and</p> <p>11 participate.</p> <p>12 Q. You felt uncomfortable when</p> <p>13 Professor Bekaert gave you a music CD; is</p> <p>14 that correct?</p> <p>15 A. Yes.</p> <p>16 Q. Did you give Professor Bekaert</p> <p>17 some face creams?</p> <p>18 A. He asked for it, yes, I did.</p> <p>19 Q. Did you speak about yourself to</p> <p>20 Professor Bekaert about your personal life?</p> <p>21 A. As little as I could.</p> <p>22 Q. Did you talk about your friend to</p> <p>23 him?</p> <p>24 A. I talked mainly about my friend</p> <p>25 who were talking about me.</p>	<p style="text-align: right;">Page 443</p> <p>1 Ravina</p> <p>2 A. The first -- one of the first</p> <p>3 instances, I don't know if it was the first</p> <p>4 but it was when I ran the first regressions</p> <p>5 for the International Diversification paper</p> <p>6 in late March of 2013 and he told me to</p> <p>7 stop, not to send anything more to the</p> <p>8 company because he wanted to create an</p> <p>9 overview of the project.</p> <p>10 And I did stop. I didn't say</p> <p>11 anything any longer and I waited for two</p> <p>12 months to receive that overview and when I</p> <p>13 asked for it he was copying and pasting from</p> <p>14 all the e-mails.</p> <p>15 Q. In March 2013 you were still</p> <p>16 getting data, right?</p> <p>17 A. In March 2013?</p> <p>18 Q. From the Indian company, were you</p> <p>19 still working on data?</p> <p>20 A. The data for the International</p> <p>21 Diversification paper was all there.</p> <p>22 Q. Were there any issues with that</p> <p>23 data, any problems with that data?</p> <p>24 A. There were -- so the way research</p> <p>25 works is that people, you know, look at the</p>